

STATE OF SOUTH CAROLINA

COUNTY OF Richland

Lisa Ryans

Plaintiff(s)

vs.

Wal-Mart Stores East, LP d/b/a Wal-Mart Store
#2214

Defendant(s)

IN THE COURT OF COMMON PLEAS

CIVIL ACTION COVERSHEET

2018-CP-40-01267

TEE
3/1/18
8:06 AM

(Please Print)

Submitted By: Paige B. George

Address: Law Office of Barry B. George
1419 Bull Street
Columbia, South Carolina 29201

SC Bar #: 75124

Telephone #: (803) 400-1219

Fax #: (803) 779-9351

Other:

E-mail: lawyer@paigebgeorge.com

NOTE: The cover sheet and information contained herein neither replaces nor supplements the filing and service of pleadings or other papers as required by law. This form is required for the use of the Clerk of Court for the purpose of docketing. It must be filled out completely, signed, and dated. A copy of this cover sheet must be served on the defendant(s) along with the Summons and Complaint.

DOCKETING INFORMATION (Check all that apply)

*If Action is Judgment/Settlement do not complete

- ☒ JURY TRIAL demanded in complaint. ☐ NON-JURY TRIAL demanded in complaint.
☐ This case is subject to ARBITRATION pursuant to the Court Annexed Alternative Dispute Resolution Rules.
☒ This case is subject to MEDIATION pursuant to the Court Annexed Alternative Dispute Resolution Rules.
☐ This case is exempt from ADR. (Proof of ADR/Exemption Attached)

NATURE OF ACTION (Check One Box Below)

- | | | | |
|--|--|--|---|
| Contracts
<input type="checkbox"/> Constructions (100)
<input type="checkbox"/> Debt Collection (110)
<input type="checkbox"/> Employment (120)
<input type="checkbox"/> General (130)
<input type="checkbox"/> Breach of Contract (140)
<input type="checkbox"/> Other (199) | Torts - Professional Malpractice
<input type="checkbox"/> Dental Malpractice (200)
<input type="checkbox"/> Legal Malpractice (210)
<input type="checkbox"/> Medical Malpractice (220)
Previous Notice of Intent Case #
20-CP-_____
<input type="checkbox"/> Notice/ File Med Mal (230)
<input type="checkbox"/> Other (299) | Torts - Personal Injury
<input type="checkbox"/> Assault/Slander/Libel (300)
<input type="checkbox"/> Conversion (310)
<input type="checkbox"/> Motor Vehicle Accident (320)
<input checked="" type="checkbox"/> Premises Liability (330)
<input type="checkbox"/> Products Liability (340)
<input type="checkbox"/> Personal Injury (350)
<input type="checkbox"/> Wrongful Death (360)
<input type="checkbox"/> Other (399) | Real Property
<input type="checkbox"/> Claim & Delivery (400)
<input type="checkbox"/> Condemnation (410)
<input type="checkbox"/> Foreclosure (420)
<input type="checkbox"/> Mechanic's Lien (430)
<input type="checkbox"/> Partition (440)
<input type="checkbox"/> Possession (450)
<input type="checkbox"/> Building Code Violation (460)
<input type="checkbox"/> Other (499) |
| Inmate Petitions
<input type="checkbox"/> PCR (500)
<input type="checkbox"/> Mandamus (520)
<input type="checkbox"/> Habeas Corpus (530)
<input type="checkbox"/> Other (599) | Judgments/Settlements
<input type="checkbox"/> Death Settlement (700)
<input type="checkbox"/> Foreign Judgment (710)
<input type="checkbox"/> Magistrate's Judgment (720)
<input type="checkbox"/> Minor Settlement (730)
<input type="checkbox"/> Transcript Judgment (740)
<input type="checkbox"/> Lis Pendens (750)
<input type="checkbox"/> Transfer of Structured Settlement Payment Rights Application (760)
<input type="checkbox"/> Other (799) | Administrative Law/Relief
<input type="checkbox"/> Reinstate Driver's License (800)
<input type="checkbox"/> Judicial Review (810)
<input type="checkbox"/> Relief (820)
<input type="checkbox"/> Permanent Injunction (830)
<input type="checkbox"/> Forfeiture-Petition (840)
<input type="checkbox"/> Forfeiture-Consent Order (850)
<input type="checkbox"/> Other (899) | Appeals
<input type="checkbox"/> Arbitration (900)
<input type="checkbox"/> Magistrate-Civil (910)
<input type="checkbox"/> Magistrate-Criminal (920)
<input type="checkbox"/> Municipal (930)
<input type="checkbox"/> Probate Court (940)
<input type="checkbox"/> SCDOT (950)
<input type="checkbox"/> Worker's Comp (960)
<input type="checkbox"/> Zoning Board (970)
<input type="checkbox"/> Public Service Commission (990)
<input type="checkbox"/> Employment Security Comm (991)
<input type="checkbox"/> Other (999) |
| Special/Complex/Other
<input type="checkbox"/> Environmental (600)
<input type="checkbox"/> Automobile Arb. (610)
<input type="checkbox"/> Medical (620)
<input type="checkbox"/> Other (699) | <input type="checkbox"/> Pharmaceuticals (630)
<input type="checkbox"/> Unfair Trade Practices (640)
<input type="checkbox"/> Out-of State Depositions (650)
<input type="checkbox"/> Motion to Quash Subpoena in an Out-of-County Action (660)
<input type="checkbox"/> Sexual Predator (510) | | |

Submitting Party Signature: Paige B. George

Date: March 5, 2018

Note: Frivolous civil proceedings may be subject to sanctions pursuant to SCRCF, Rule 11, and the South Carolina Frivolous Civil Proceedings Sanctions Act, S.C. Code Ann. §15-36-10 et. seq.

FOR MANDATED ADR COUNTIES ONLY

Allendale, Anderson, Beaufort, Colleton, Florence, Greenville, Hampton, Horry,
Jasper, Lexington, Pickens (Family Court Only), Richland, Union and York

SUPREME COURT RULES REQUIRE THE SUBMISSION OF ALL CIVIL CASES TO AN ALTERNATIVE DISPUTE RESOLUTION PROCESS, UNLESS OTHERWISE EXEMPT.

You are required to take the following action(s):

1. The parties shall select a neutral and file a "Proof of ADR" form on or by the 210th day of the filing of this action. If the parties have not selected a neutral within 210 days, the Clerk of Court shall then appoint a primary and secondary mediator from the current roster on a rotating basis from among those mediators agreeing to accept cases in the county in which the action has been filed.
2. The initial ADR conference must be held within 300 days after the filing of the action.
3. Pre-suit medical malpractice mediations required by S.C. Code §15-79-125 shall be held not later than 120 days after all defendants are served with the "Notice of Intent to File Suit" or as the court directs. (Medical malpractice mediation is mandatory statewide.)
4. Cases are exempt from ADR only upon the following grounds:
 - a. Special proceeding, or actions seeking extraordinary relief such as mandamus, habeas corpus, or prohibition;
 - b. Requests for temporary relief;
 - c. Appeals
 - d. Post Conviction relief matters;
 - e. Contempt of Court proceedings;
 - f. Forfeiture proceedings brought by governmental entities;
 - g. Mortgage foreclosures; and
 - h. Cases that have been previously subjected to an ADR conference, unless otherwise required by Rule 3 or by statute.
5. In cases not subject to ADR, the Chief Judge for Administrative Purposes, upon the motion of the court or of any party, may order a case to mediation.
6. Motion of a party to be exempt from payment of neutral fees due to indigency should be filed with the Court within ten (10) days after the ADR conference has been concluded.

**Please Note: You must comply with the Supreme Court Rules regarding ADR.
Failure to do so may affect your case or may result in sanctions.**

STATE OF SOUTH CAROLINA
COUNTY OF RICHLAND

Lisa Ryans,

Plaintiff(s),

vs.

Wal-Mart Stores East, LP d/b/a Wal-Mart
Store #2214,

Defendant(s).

IN THE COURT OF COMMON PLEAS
FOR THE FIFTH JUDICIAL CIRCUIT

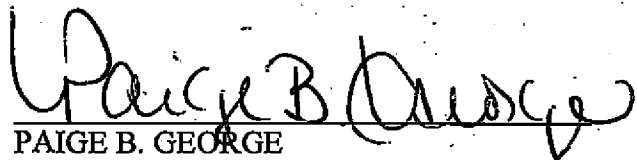
Civil Action No. 2018-CP-40-_____

SUMMONS
(Jury Trial Requested)

RICHLAND COUNTY
FILED
2018 MAR -6 AM 11:15
JEANNETTE W. MCBRIDE
C.C.P. & G.S.

TO: THE ABOVE-NAMED DEFENDANT

YOU ARE HEREBY SUMMONED and required to answer the Complaint in this action of which a copy is herewith served upon you and to serve a copy of your Answer to the said Complaint on the subscriber at her office, 1419 Bull Street, Columbia, South Carolina 29201, within thirty (30) days from the date of service hereof, exclusive of the date of such service; and if you fail to answer the Complaint within the time aforesaid, judgment by default will be rendered against you for the relief demanded in the Complaint.



PAIGE B. GEORGE
LAW OFFICE OF BARRY B. GEORGE
ATTORNEY FOR THE PLAINTIFF(S)
1419 Bull Street
Columbia, South Carolina 29201
(803) 254-7222

Columbia, South Carolina
March 5, 2018

STATE OF SOUTH CAROLINA)

COUNTY OF RICHLAND)

Lisa Ryans,)

Plaintiff,)

vs.)

Wal-Mart Stores East, LP d/b/a Wal-Mart
Store #2214,)

Defendant.)

IN THE COURT OF COMMON PLEAS
FOR THE FIFTH JUDICIAL CIRCUIT

Civil Action No. 2018-CP-40-_____

COMPLAINT

RICHLAND COUNTY
FILED
2018 MAR -6 AM 11:15
JEANNETTE W. MCBRIDE
C.C.P. & G.S.

The Plaintiff, complaining of the Defendant herein, alleges:

1. That the Plaintiff is a citizen and resident of the County of Richland, State of South Carolina; that, upon information and belief the Defendant is a corporation organized and existing under the laws of one of the states of the United States and maintains agents and servants in the county and state aforesaid for the purpose of carrying on its business.

2. That on or about March 30, 2017, the Plaintiff, Lisa Ryans, was an invitee of the Defendant in its store located at 5420 Forest Drive, in the County of Richland, State of South Carolina, when Plaintiff was struck by bins and other foreign objects, thus causing her severe and painful bodily injuries.

3. That the Defendant, Wal-Mart Stores East, LP d/b/a Wal-Mart Store #2214, by its agents, servants, and employees was negligent, grossly negligent, willful, wanton, careless and reckless in the following particulars, to-wit:

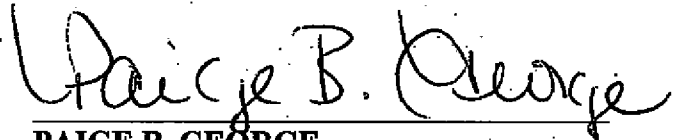
- (a) in failing to maintain the premises in a safe condition;
- (b) in failing to warn the Plaintiff of the unsafe conditions;
- (c) in failing to inspect the premises;
- (d) in creating an unsafe condition;
- (e) in failing to properly strap bins together;
- (f) in failing to stock shelves' contents properly;
- (g) in failing to assist Plaintiff;
- (h) such other particulars as the evidence at trial may show.

All of which were the direct and proximate cause of the injuries and damages suffered by the Plaintiff herein; said acts being in violation of the case and statute laws of the State of South Carolina.

4. That as a result of the above, the Plaintiff suffered injuries in and about her body, all of which has and will cause her to undergo much physical pain and suffering, has and will cause her to have to spend money on medical services, has and will cause her mental anguish and has and will cause her to lose money in the nature of wages and earnings.

5. That the Plaintiff is informed and believes she is entitled to judgment against the Defendant for actual damages in an amount to be determined by a jury; and an appropriate amount of punitive damages.

WHEREFORE, Plaintiff prays for judgment against the Defendant for actual damages in an amount to be determined by a jury; an appropriate amount of punitive damages; for the costs this action; and for such other and further relief as this Court may deem just and proper.



PAIGE B. GEORGE
BARRY B. GEORGE
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Columbia, South Carolina 29201
(803) 400-1219